

Before the  
Federal Communications Commission  
Washington, DC 20554

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Federal Communications Commission  
Office of the Secretary

In the Matter of )  
Federal-State Joint Board on Universal Service )  
Petition of Telenational Communications, Inc. )  
For waiver of Section 54.307(c) )  
To: The Commission )

CC Docket No. 96-45

WC Docket No. 08-71

PETITION FOR WAIVER

Telenational Communications, Inc.

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**To The Commission:**

# PETITION FOR WAIVER

Telenational Communications, Inc. , carrier (“CLEC”) hereby seeks a waiver of Section 54.307(c) of the Commission’s Rules. As discussed below, Telenational Communications, Inc., reasonably believed it had timely filed its working line count data with Universal Service Administration Company (USAC) for eligibility for receiving High Cost Loop Support (HCL) under Commission precedent, special circumstances described below warrant a grant of waiver.

## **I. FACTUAL BACKGROUND**

On March 31, 2011, the Federal Communications Commission Form 525 High Cost Support Mechanism Competitive Carrier Line Count Report was filed one day after the deadline by Telenational Communications, Inc. due to a clerical error. IAS line counts were due on March 31, 2011, in error Telenational Communications, Inc. thought HCL and IAS counts were due on the same date and therefore Filed the HCL counts one day late.

## **II. GOOD CAUSE EXISTS FOR WAIVER OF SECTION 54.307(c)**

Pursuant to section 1.3 of its rules, the Commission may waive any of its rules in whole or in part, If there is good cause. In numerous cases, the Commission has granted waivers to accept late filings from HCL Recipients who, like Telenational Communications, Inc. , made reasonable efforts to ensure a timely filing, but failed to do so as a result of a clerical error. Thus, the Commission should waive Section 54.307(c) to accept the Form 525 for High Cost Loop Support from Telenational Communications, Inc.

## **CONCLUSION**

Telenational Communications, Inc. , reasonably believed it had filed its Affidavit for renewal of certification on time. However, due to an honest clerical error said certification was received after the due date. Grant of a waiver is consistent with Commission precedent, and will serve the public interest.

Respectfully submitted,

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